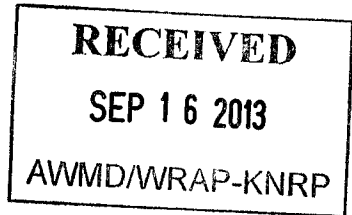




**Environmental
Operations, Inc.**
CLEARING THE WAY



September 13, 2013

Mr. Bruce Morrison
Project Manager
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

RE: Monthly Progress Report
Solutia – John F. Queeny Plant
St. Louis, Missouri
EPA ID No. MOD 004 954 111

Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Monthly Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009. Per the Interim Measures Work Plan, these reports will be submitted every month.

Reporting Period

August 1, 2013 – August 31, 2013

Description of the work conducted pursuant to the Order during the reporting period.

- EOI completed review of groundwater data reports from the July quarterly event.
- EOI completed the design of the final injection event. The type and amount of material to be injected, locations, and water removal to potentially improve effectiveness were determined. The order with Regenesys was placed.
- EOI contacted contractors for availability to perform the injection work.

Estimate of the percentage of the project completed during the reporting period

- 1%

RCRA



526517

Environmental Consulting & Remediation, Demolition, & Geotechnical Engineering
1530 South Second Street • Saint Louis, Missouri 63104-4500 • 314-241-0900

www.environmentalops.com

Mr. Bruce Morrison
September 13, 2013

Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

- The waste profile for Heritage to accept PCB soil was not completed. The work was initiated during August, but was not finalized. EOI anticipates completing it during September.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

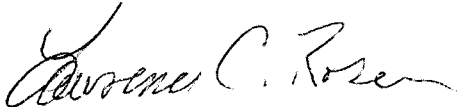
- The attached CD contains the groundwater data reports for the sampling event completed in July 2013. If paper copies are needed, please advise.

Description of the projects and actions which are scheduled for the following reporting period.

- EOI will identify a qualified contractor for the injection work and schedule the task to commence in September.
- Communicate with the St. Louis Metropolitan Sewer District for permitting and treatment requirements for water extracted during the injection event.
- EOI will complete the waste profile information for Heritage for disposal of additional PCB soil from the VV Building area. After that is accomplished, scheduling of the work will occur.
- EOI/SWH will continue to work with the EPA regarding financial assurance information modifications and will respond accordingly.

If there are questions or concerns related to this Progress Report please contact Larry Rosen who can be reached by phone at (314) 480-4694, or via email at larryr@environmentalops.com.

Respectfully submitted,
ENVIRONMENTAL OPERATIONS, INC.



Lawrence C. Rosen, R.G.
Senior Project Manager

Attachment: CD containing Pace Analytical Laboratory Reports
60148443, 60148689, 60148857, 60148929, 60149015

Copy: Mr. Michael House/Solutia
Ms. Christine Kump-Mitchell/MDNR
Mr. Rich Nussbaum/ MDNR